

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION

UNITED STATES OF AMERICA

PLAINTIFF

V.

CIVIL ACTION No. 3:16cv27CWR-FKB

REAL PROPERTY LOCATED AT  
19 CRANE PARK, HATTIESBURG,  
LAMAR COUNTY, MISSISSIPPI,  
WITH ALL APPURTENANCES,  
IMPROVEMENTS AND FIXTURES  
THEREON, ET AL.

DEFENDANT  
PROPERTY

**VERIFIED CLAIM OF COLLINS PIPELINE COMPANY**

Pursuant to Rule G of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions and 18 U.S.C. § 983, the herein-identified Claimant, Collins Pipeline Company, a Delaware corporation ("Claimant"), files this Verified Claim, and asserts an interest in a portion of the real property identified in the Complaint for Forfeiture, as follows:

A. Claimant identifies the following specific property in which it claims an interest:

1. [Identified as Paragraph UU in Exhibit A to the Complaint]

Real property located on JD Hatten Road, Sumrall, Lamar County, Mississippi  
Parcel No. 165-22-007-000

20 acres, more or less, being in the West ½ of the NE ¼ of the NW ¼ of Section 22, Township 5 North, Range 16 West, Lamar County, Mississippi;

AND ALSO Beginning at a pine knot grader blade and x-tie fence corner found on the SE corner of the NW ¼ of the SW ¼ of Section 22, Township 5 North, Range 16 West, Lamar County, Mississippi; thence North 00°03'47" West a distance of 1318.96 feet to an iron pin and fence corner; thence North 89°14'48" East a distance of 1322.71 feet to a pine know; thence South 00°31'29" East a distance of 1339.83 feet to a x-tie fence corner; thence North 89°51'11" West a distance of 1333.42 feet back to the Point of Beginning; containing 40.53 acres, more, or less, and being in the NW 1/4 of the SW ¼ of Section 22, Township 5 North, Range 16 West, Lamar County, Mississippi;

AND ALSO Beginning at a pine knot grader blade and x-tie fence corner found on the SE corner of the NW  $\frac{1}{4}$  of the SW  $\frac{1}{4}$  of Section 22, Township 5 North, Range 16 West, Lamar County, Mississippi, said point being the Point of Beginning; thence South  $00^{\circ}06'35''$  West a distance of 1323.44 feet to a pine knot and grader blade; thence South  $00^{\circ}32'30''$  East a distance of 1313.73 feet to an iron pin; thence South  $89^{\circ}52'45''$  West a distance of 1300.00 feet to a pine knot and grader blade; thence North  $00^{\circ}32'49''$  West a distance of 1319.42 feet; thence South  $89^{\circ}36'58''$  West a distance of 1309.55 feet to an iron pin; thence North  $00^{\circ}12'29''$  East a distance of 1313.39 feet to an iron pin and t-post; thence South  $89^{\circ}22'10''$  West a distance of 1304.76 feet to a t-post; thence North  $00^{\circ}03'12''$  West a distance of 1302.47 feet to a found pine knot; thence North  $89^{\circ}16'27''$  West a distance of 1962.77 feet to an iron pin; thence North  $00^{\circ}11'04''$  East a distance of 1330.31 feet to an iron pin; thence North  $89^{\circ}23'51''$  East a distance of 3216.25 feet to a x-tie fence corner; thence South  $01^{\circ}01'49''$  East a distance of 2014.89 feet to an iron pin; thence North  $89^{\circ}28'13''$  East a distance of 1297.83 feet to an iron pin; thence North  $00^{\circ}32'49''$  West a distance of 659.80 feet to a nail in the center of Foster Road and the point of curve of a non-tangent curve to the left, of which the radius point lies North  $86^{\circ}28'08''$  East a radial distance of 458.08 feet; thence along the center of said road South along the arc having a chord direction of South  $15^{\circ}57'59''$  East a chord distance of 197.29 feet, through a central angle of  $24^{\circ}52'15''$  a distance of 198.84 feet; thence continuing along said road South  $28^{\circ}24'06''$  East a distance of 989.43 feet to the point of curve of a non-tangent curve to the left, of which the radius point lies North  $60^{\circ}00'04''$  East a radial distance of 867.12 feet; thence continuing along said road SE along the arc having a chord direction of South  $41^{\circ}29'45''$  East a chord distance of 345.66 feet, through a central angle of  $22^{\circ}59'37''$ , a distance of 347.99 feet to a railroad spike; thence leaving said road run North  $89^{\circ}57'03''$  East a distance of 573.99 feet back to the Point of Beginning; containing 287.01 acres, more or less, and located in the NE  $\frac{1}{4}$  of the NE  $\frac{1}{4}$  of Section 28, the SE  $\frac{1}{4}$  and the NE  $\frac{1}{4}$  of the SW  $\frac{1}{4}$  and South  $\frac{1}{2}$  of the NW  $\frac{1}{4}$  of Section 21; and the East  $\frac{1}{2}$  of SE  $\frac{1}{4}$  of the NE  $\frac{1}{4}$  of Section 20; all in Township 5 North, Range 16 West, Lamar County, Mississippi; together with all improvements thereon and appurtenances thereunto belonging.

2. [Identified as Paragraph VV in Exhibit A to the Complaint]

Real property located on Foster Road, Sumrall, Lamar County, Mississippi

Parcel No. 165-22-023-000

20 acres, more or less, being in the West  $\frac{1}{2}$  of the NE  $\frac{1}{4}$  of the NW  $\frac{1}{4}$  of Section 22, Township 5 North, Range 16 West, Lamar County, Mississippi;

AND ALSO Beginning at a pine knot grader blade and x-tie fence corner found on the SE corner of the NW  $\frac{1}{4}$  of the SW  $\frac{1}{4}$  of Section 22, Township 5 North, Range 16 West, Lamar County, Mississippi; thence North  $00^{\circ}03'47''$  West a

distance of 1318.96 feet to an iron pin and fence corner; thence North 89°14'48" East a distance of 1322.71 feet to a pine knot; thence South 00°31'29" East a distance of 1339.83 feet to a x-tie fence corner; thence North 89°51'11" West a distance of 1333.42 feet back to the Point of Beginning; containing 40.53 acres, more, or less, and being in the NW ¼ of the SW ¼ of Section 22, Township 5 North, Range 16 West, Lamar County, Mississippi;

AND ALSO Beginning at a pine knot grader blade and x-tie fence corner found on the SE corner of the NW ¼ of the SW ¼ of Section 22, Township 5 North, Range 16 West, Lamar County, Mississippi, said point being the Point of Beginning; thence South 00°06'35" West a distance of 1323.44 feet to a pine knot and grader blade; thence South 00°32'30" East a distance of 1313.73 feet to an iron pin; thence South 89°52'45" West a distance of 1300.00 feet to a pine knot and grader blade; thence North 00°32'49" West a distance of 1319.42 feet; thence South 89°36'58" West a distance of 1309.55 feet to an iron pin; thence North 00°12'29" East a distance of 1313.39 feet to an iron pin and t-post; thence South 89°22'10" West a distance of 1304.76 feet to a t-post; thence North 00°03'12" West a distance of 1302.47 feet to a found pine knot; thence North 89°16'27" West a distance of 1962.77 feet to an iron pin; thence North 00°11'04" East a distance of 1330.31 feet to an iron pin; thence North 89°23'51" East a distance of 3216.25 feet to a x-tie fence corner; thence South 01°01'49" East a distance of 2014.89 feet to an iron pin; thence North 89°28'13" East a distance of 1297.83 feet to an iron pin; thence North 00°32'49" West a distance of 659.80 feet to a nail in the center of Foster Road and the point of curve of a non-tangent curve to the left, of which the radius point lies North 86°28'08" East a radial distance of 458.08 feet; thence along the center of said road South along the arc having a chord direction of South 15°57'59" East a chord distance of 197.29 feet, through a central angle of 24°52'15" a distance of 198.84 feet; thence continuing along said road South 28°24'06" East a distance of 989.43 feet to the point of curve of a non-tangent curve to the left, of which the radius point lies North 60°00'04" East a radial distance of 867.12 feet; thence continuing along said road SE along the arc having a chord direction of South 41°29'45" East a chord distance of 345.66 feet, through a central angle of 22°59'37", a distance of 347.99 feet to a railroad spike; thence leaving said road run North 89°57'03" East a distance of 573.99 feet back to the Point of Beginning; containing 287.01 acres, more or less, and located in the NE ¼ of the NE ¼ of Section 28; the SE ¼ and the NE ¼ of the SW ¼ and the South ½ of the NW ¼ of Section 21; and the East ½ of SE ¼ of the NE ¼ of Section 20; all in Township 5 North, Range 16 West, Lamar County, Mississippi; together with all improvements thereon and appurtenances thereunto belonging.

3. Any such other real property interests Collins Pipeline may have in the Defendant Properties that are subject to the pipeline easement and right of way identified below.

B. Identity of the Claimant and the Claimant's interest in the property:

Collins Pipeline Company, a Delaware corporation, is the Claimant herein. Claimant's interest in the above-described properties is a pipeline easement and right of way, the specifics of which are recorded in the Chancery Court of Lamar County at Book 4-U, Page 23-25, a copy of which is attached hereto as Exhibit A.

The Claimant demands return of its interests in the above-described properties and the right to defend in this civil action.

**VERIFICATION**

I attest and declare under penalty of perjury that this claim is true and correct and that I am authorized by Collins Pipeline Company to execute this verification on its behalf.

This the 7th day of June, 2016.

COLLINS PIPELINE COMPANY

By: Dane A. Holbrook  
Dane A. Holbrook, Assistant Secretary

SWORN TO AND SUBSCRIBED before me, this the 7<sup>th</sup> day of June, 2016.

Lisa D. Schell  
Notary Public

My Commission Expires:

at death

Lisa D. Schell, Notary Public  
St. Bernard ID No: 39694  
St. Tammany ID No: 83653  
My commission is for life.

Of Counsel:

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### **CERTIFICATE OF SERVICE**

I hereby certify that I have this day caused to be hand delivered and electronically filed with the ECF system a copy of this Verified Claim of Collins Pipeline Company upon the following:

Marc A. Perez, Assistant U. S. Attorney  
501 East Court Street, Ste. 4.430  
Jackson, MS 39201

J. Scott Gilbert, Assistant U. S. Attorney  
501 East Court Street, Ste. 4.430  
Jackson, MS 39201

I have served all other counsel of record by the ECF system.

This the 7<sup>th</sup> day of June, 2016.

/s/ W. Whitaker Rayner  
W. Whitaker Rayner